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6 Attorneys for Defendant  
REYES QUINONEZ  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 REYES QUINONEZ,

15 Defendant.  
16

Case No. 1:23-cr-00054-JLT-SKO

STIPULATION TO CONTINUE  
SENTENCING; ORDER

Date: March 3, 2025  
Time: 9:00 a.m.

17 IT IS HEREBY STIPULATED by and between the parties through their respective  
18 counsel, Assistant United States Attorney Justin Gilio, counsel for plaintiff, and Assistant  
19 Federal Defender Reed Grantham, counsel for Reyes Quinonez, that the sentencing hearing  
20 currently scheduled for January 27, 2025, at 9:00 a.m. may be continued to March 3, 2025, at  
21 9:00 a.m.

22 Mr. Quinonez entered a plea of guilty to Count One of the Indictment on August 19,  
23 2024. *See* Dkt. #45. The matter was then scheduled for sentencing on November 12, 2024. *See*  
24 Dkt. #45. The draft Presentence Investigation Report (PSR) was filed on September 30, 2024.  
25 *See* Dkt. #46. After review of the draft PSR, and in light of information contained therein, on  
26 October 2, 2024, counsel for Mr. Quinonez requested records from the California Department of  
27 Corrections and Rehabilitation (CDCR). Counsel received these records from CDCR on  
28 December 13, 2024. The records are voluminous and total 777 pages. Counsel for Mr. Quinonez

1 requires additional time to review these records and to prepare any informal objections to the  
2 draft PSR. As a result, the parties are requesting that the sentencing hearing be continued to  
3 Monday, March 3, 2025, at 9:00 a.m.

4 The government does not oppose the continuance of the sentencing in this matter to the  
5 date proposed herein. The requested continuance is made with the intention of conserving time  
6 and resources for both the parties and the Court. The requested date is a mutually agreeable date  
7 for all parties. As this is a sentencing hearing, no exclusion of time is necessary.

8  
9 Respectfully submitted,

10 PHILLIP A. TALBERT  
11 United States Attorney

12 Date: December 20, 2024

/s/ Justin Gilio  
13 JUSTIN GILIO  
Assistant United States Attorney  
14 Attorney for Plaintiff

15 HEATHER E. WILLIAMS  
16 Federal Defender

17 Date: December 20, 2024

/s/ Reed Grantham  
18 REED GRANTHAM  
Assistant Federal Defender  
19 Attorney for Defendant  
REYES QUINONEZ

20  
21  
22 **ORDER**

23 IT IS HEREBY ORDERED that the sentencing hearing scheduled for Monday, January  
24 27, 2025, at 9:00 a.m. be continued to Monday, March 3, 2025, at 9:00 a.m.

25 IT IS SO ORDERED.

26  
27 Dated: **December 22, 2024**

  
UNITED STATES DISTRICT JUDGE